

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
(HARRISBURG)**

IN RE:

ELIZABETH LEAH HINKLE AKA BETH L HINKLE)
AKA ELIZABETH L BROWN)

DEBTOR)

CHAPTER 13

NO. 1:21-BK-01190-HWV

**OBJECTION OF US BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET
TRUST TO CONFIRMATION OF CHAPTER 13 PLAN**

US Bank Trust National Association, Not in Its Individual Capacity but Solely As Owner Trustee For VRMTG Asset Trust (hereinafter "Secured Creditor") objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Secured Creditor filed a secured proof of claim for the property located at **97 Lee Ann Court, Enola, PA 17025** (hereinafter "the Property"), setting forth pre-petition arrears in the amount of \$38,136.39.
2. Debtor's Plan includes \$36,303.55 in arrears; however, the Plan also states that "the plan is calculated to be a 36-month 100% plan, with plan payments paying administrative claims within the first 13 months, the mortgage and any other debts secured by the real property to be paid through the sale of the real property by the 13th month of the plan, and unsecured debts to be paid in full through plan payments thereafter."
3. Secured Creditor objects that no payments are being made by Debtor to Secured Creditor for thirteen (13) months.
4. Secured Creditor also objects that there is no language in the proposed Plan that indicates that the Secured Creditor will be paid in full at the time of the sale of the Property. .
5. In addition, Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.
Pennsylvania Bar #205047
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Creditor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Objection to Confirmation of Chapter 13 Plan has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 17th day of August 2021

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.
Pennsylvania Bar #205047
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Creditor

SERVICE LIST (CASE NO. 1:21-bk-01190-HWV)

DEBTOR
ELIZABETH LEAH HINKLE
97 LEE ANN COURT
ENOLA, PA 17025

ATTORNEY FOR DEBTOR
KELLY M WALSH
SCARINGI LAW
2000 LINGLESTOWN ROAD, STE 106
HARRISBURG, PA 17110

TRUSTEE
JACK N ZAHAROPOULOS (TRUSTEE)
STANDING CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036

U.S. TRUSTEE
UNITED STATES TRUSTEE
228 WALNUT STREET, SUITE 1190
HARRISBURG, PA 17101

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ORDER

Upon consideration of the Objection to Confirmation of the Chapter 13 Plan filed by US Bank Trust National Association, Not in Its Individual Capacity but Solely As Owner Trustee For VRMTG Asset Trust it is **Ordered** and **Decreed** that confirmation is **denied**.

Bankruptcy Judge